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May 21, 2020

Via ECF

The Honorable Steven Tiscione, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Francisco v. NY Tex Care, Inc. et al.*
Case No. 19-cv-1649

Dear Judge Tiscione:

We are counsel for Plaintiff and write to respectfully request, with consent from Defendants, a six (6) month extension of fact discovery to November 22, 2020, and a parallel extension time to file dispositive motions to December 21, 2020.

Pursuant to the Scheduling Order dated September 3, 2019, fact discovery, including depositions, is to be completed by May 22, 2020, and all dispositive motions are to be filed by June 21, 2020.

As the Court is aware, Your Honor has only recently filed his Report and Recommendation granting in part Plaintiff's Motion to Certify its FLSA Collective Action Pursuant to 29 U.S.C. § 216(b). When this Report and Recommendation is adopted by Judge Pamela K. Chen, time to notice potential opt-in plaintiffs, obtain further discovery as to those plaintiffs, review discovery, and depose further witnesses will be required.

As such, Plaintiff requests additional time to complete discovery. There has been no previous request for an extension.

We thank Your Honor for considering this matter.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.